

1 WATTS GUERRA LLP
Mikal C. Watts
2 Paige Boldt, SBN 308772
70 Stony Point Road, Suite A
3 Santa Rosa, California 95401
Phone: (707) 241-4567
4 2561 California Park Drive, Suite 100
Chico, California 95928
5 Phone: (530) 240-6116
Email: mcwatts@wattsguerra.com

6 *Attorney for Numerous Wild Fire Claimants*

7
8 UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10 In re:
11 PG&E CORPORATION
12 - and -
13 PACIFIC GAS AND ELECTRIC
14 COMPANY,
15 Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**OPPOSITION TO DECLARATION AND
SUPPLEMENTAL DECLARATION OF
JEREMIAH F. HALLISEY, ESQ. IN
SUPPORT OF JOINDER OF CERTAIN
FIRE VICTIMS IN WILLIAM B.
ABRAMS MOTION TO DESIGNATE
IMPROPERLY SOLICITED VOTES
PURSUANT TO 11 U.S.C. §1125(B) AND
1126(E) AND BANKRUPTCY RULE 2019**

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors

22 ** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Date: May 12, 2020
Time: 10:00 a.m.
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: Docket No. 7140, 7148

24 TO THE COURT, ALL PARTIES, AND ALL ATTORNEYS OF RECORD

25
26 On May 10, 2020, at 11:14:15 p.m. on a Sunday evening, Jeremiah Hallisey filed his
27 Declaration of Jeremiah Hallisey, Esq. in Support of Joinder of Certain Fire Victims in William B.
28 Abrams Motion to Designate Improperly Solicited Votes Pursuant to 11 U.S.C. §§ 1125(B) and

1 1126(E) and Bankruptcy Rule 2019 (Doc. #7140). On May 11, 2020, at 9:06:09 p.m., Jeremiah
2 Hallisey then filed his Supplemental Declaration of Jeremiah Hallisey, Esq. in Support of Joinder
3 of Certain Fire Victims in William B. Abrams Motion to Designate Improperly Solicited Votes
4 Pursuant to 11 U.S.C. §§ 1125(B) and 1126(E) and Bankruptcy Rule 2019 (Doc. #7148). Though
5 Doc. #7140 and Doc, #7148 are untimely and should be stricken for that reason alone, WATTS
6 GUERRA LLP - out of an abundance of caution - provides the following short Opposition to these
7 filings for this Court's consideration.

9 **I. RESPONSE TO EX. I - DECLARATION OF KAREN LYNN INGALLS**

10 WATTS GUERRA has never represented Karen Lynn Ingalls, and has no information
11 concerning her receipt or non-receipt of information from Prime Clerk. Nonetheless, the
12 declaration of a single individual does not justify the relief sought – the disenfranchisement of more
13 than 13,000 WATTS GUERRA clients who already have voted to ACCEPT the Plan.

15 **II. RESPONSE TO EX. II - DECLARATION OF DEBBIE POOL**

16 WATTS GUERRA respectfully responds herewith to each of the statements made in the
17 Declaration of Debbie Pool ("POOL"), its former client.

18 **A. POOL KNEW OR SHOULD HAVE KNOWN OF WATTS GUERRA'S**
19 **INVOLVEMENT IN REPRESENTING HER AND MANAGING HER CLAIM**

20 1. In Paragraph 2 of her Declaration, POOL writes, "[a]t the time I engaged Mr. Earley,
21 I did not understand that Watts Guerra would also be representing me and managing my claim."
22 (Doc. #7140, p. 9). However, she signed a Contract of Employment and Consent to Fee Sharing
23 (Camp Fire) with WATTS GUERRA and others that specifically states otherwise. See Declaration
24 of Mikal C. Watts, ¶4, attached hereto as Exhibit 1. In that contract, POOL personally signed a
25 Contract of Employment and Consent to Fee Sharing (Camp Fire) that stated:
26

- 27 - "The undersigned called "Client" (Client's printed name – Debbie Pool), hereby
28 employs the Law Office of Doug Boxer, Law Office of Joseph Earley, Watts
Guerra LLP, and Mauro O'Neill Archer LLC, called "the Firms," as my

attorneys to represent me in all claims, suits, or other matters arising out of and resulting from damages suffered by me from the November 2018 wildfire occurring in Butte County, California.

- 3. CONTINGENCY FEE ARRANGEMENT. The Firms will assume joint responsibility for the Client's representation....
- 3. Client consents to the Firms' sharing these attorneys' fees as follows: 5% to the Law Office of Douglas Boxer, 5% to the Law Office of Joseph Earley, 60% to Watts Guerra LLP and 30% to Mauro O'Neill Archer LLC.

Moreover, after POOL personally signed this contract, and a copy of it was sent to her by WATTS GUERRA, together with a litany of quarterly update letters from WATTS GUERRA, together with weekly updates from Joe Earley from March, 2019 to the present. *See* Declaration of Mikal Watts, ¶4, , attached hereto as Exhibit 1.

B. EARLEY'S FEBRUARY, 2020 EMAILS TO POOL WERE NORMAL CLIENT UPDATES, NOT SOLICITATIONS FOR VOTES PRIOR TO MARCH 31, 2020

In Paragraph 2 of her Declaration, POOL writes, "[a]ttached as Exhibit A are true and correct copies of two emails urging me to accept the Plan and that I received in February 2020." For four reasons, those emails are not premature solicitations of votes under 11 U.S.C. §1125(b).

First, Joe Earley's February 14, 2020 email to POOL was not a solicitation for her vote prior to the transmission of the court-ordered Disclosure Statement and other materials. Rather, it was an email in direct reply to the email that she sent to him. *See* Exhibit "A" to the Declaration of Joe Earley, ¶5, attached hereto as Exhibit 2.

Second, POOL now confuses Joe Earley's weekly client update email on February 21, 2020 as a solicitation for her to accept the Plan then. Indeed, no email from Joe Earley, nor any other lawyer working with WATTS GUERRA, ever solicited a vote from any of its clients prior to March 31, 2020 when WATTS GUERRA transmitted to its clients the court-ordered materials, including the court-approved Disclosure Statement. *See* Declaration of Joe Earley, ¶¶6, 8, attached hereto as Exhibit 2.

1 *Third*, no client of WATTS GUERRA, nor of Joe Earley, nor any other lawyer working
2 with WATTS GUERRA, was even given an opportunity to vote prior to March 31, 2020. *See*
3 Declaration of Mikal C. Watts, ¶5, attached hereto as Exhibit 1; Declaration of Joe Earley, ¶7,
4 attached hereto as Exhibit 2; Declaration of Roy Miller, ¶5, attached hereto as Exhibit 4.

5
6 *Fourth*, clients of WATTS GUERRA and Joe Earley have continued to receive weekly
7 updates since the voting period began. Since March 31, 2020, Joe Earley has sent out the following
8 weekly client updates:

- 9 - 04/03/2020 - April 3rd Client Update;
- 10 - 04/10/2020 - April 10th Client Update;
- 11 - 04/17/2020 - April 17th Client Update;
- 12 - 04/24/2020 - April 24th Client Update;
- 13 - 05/01/2020 - Bankruptcy Vote / Settlement Claims Update; and
- 14 - 05/08/2020 - May 8th Client Update.

15
16 **C. ONLY AFTER POOL TERMINATED HER ENGAGEMENT WITH WATTS**
17 **GUERRA IN WRITING DID WATTS GUERRA THEN APPROPRIATELY CLOSE**
18 **HER FILE ON APRIL 6, 2020**

19 In Paragraphs 4-5 of her Declaration, POOL writes:

20 I told Watts Guerra that I was terminating their engagement on February 28,
21 2020, then again on February 29, 2020, and a third time on March 3, 2020. I spoke
22 to Guy Watts on March 9, 2020. He asked why I was terminating the
23 relationship, so I gave him several reasons. He raised his voice and argued with me.
24 I felt rudely treated. I did not get confirmation that they had closed my file until
25 April 6, 2020.

26 However, WATTS GUERRA tracks each communication it has with its clients, and its records of
27 communications with POOL demonstrates that it terminated its relationship with her. These
28 contemporaneously-prepared records of WATTS GUERRA's communication with POOL support
the recollection of Guy L. Watts II, who in his Declaration, attached hereto as Exhibit 3, declares
under penalty of perjury as follows:

- On March 6, 2020, I was asked by a member of our firm to contact client Debbie Pool ("POOL"), who had asked to speak with a lawyer. On March 6, 2020, I left a voice message on Ms. Pool's mobile phone. This message did not solicit or even mention a vote of PG&E's reorganization plan. (Declaration of Guy L. Watts II, Ex. 3 hereto, ¶3);
- On March 9, 2020, I spoke with Ms. Pool. I vividly recall my conversation with POOL, because after addressing several of her concerns, POOL thanked me for my work and for spending so much time on the phone with her (I looked at my office phone and noted a 51-minute call). (Declaration of Guy L. Watts II, Ex. 3 hereto, ¶4);
- Before hanging up, I confirmed with Ms. Pool that she wanted us to continue working on her behalf. She said she did, so I told her I would send an email to her, confirming her desire for us to continue her representation and providing her contact information for other members of our team who could help with any future questions. (Declaration of Guy L. Watts II, Ex. 3 hereto, ¶5);
- After the call, on March 9, 2020 at 12:55 pm, I emailed Ms. Pool, referencing our call, confirming our continued representation, and introducing her to other members of our team. (Declaration of Guy L. Watts II, Ex. 3 hereto, ¶6);
- Thereafter, I received a communication from Ms. Pool asking that we end our representation of her. I then copied my assistant, and advised Ms. Pool that we would be closing her file. (Declaration of Guy L. Watts II, Ex. 3 hereto, ¶7); and
- Our firm's correspondence concerning the termination of our attorney-client relationship with Ms. Pool occurred on April 6, 2020. (Declaration of Guy L. Watts II, Ex. 3 hereto, ¶8).

D. EXHIBIT "B" TO POOL'S DECLARATION, DATED MARCH 31, 2020, IS THE FIRST SOLICITATION OF A VOTE ON THE PLAN, AND CAME WITH A TRANSMISSION OF ALL COURT-ORDERED MATERIALS, INCLUDING THE DISCLOSURE STATEMENT

In paragraph 5 of her declaration, POOL writes, "[a]ttached as Exhibit B is a true and correct copy of an email I received at 8:23 AM urging me to accept the Plan." Exhibit B is the first solicitation by WATTS GUERRA, or any lawyer with whom it is working, of a vote on the Plan, and it was sent to POOL together with a transmission of all court-ordered materials, including the Disclosure Statement. See Declaration of Mikal C. Watts, ¶6, attached hereto as Exhibit 1; Declaration of Joe Earley, ¶5, attached hereto as Exhibit 2; Declaration of Roy Miller, ¶6, attached hereto as Exhibit 4. In fact, WATTS GUERRA did not email POOL at 8:23 a.m.; she was texted

1 on March 31, 2020 at 9:43 p.m. PDT, and she first opened the it on April 1, 2020 at 10:12 a.m.
2 PDT. The 8:23 a.m. shown on Exhibit B to POOL's declaration is the current time when she took
3 a screenshot of the email, as all of the screenshots used in her exhibits have times between 8:23
4 a.m. and 8:45 a.m. *See* Declaration of Mikal C. Watts, ¶6, attached hereto as Exhibit 1.
5 Nonetheless, the first voting solicitation sent to POOL went to her on March 31, 2020, together
6 with the court-ordered documents including the Disclosure Statement.
7

8 **E. EXHIBIT "C" TO POOL'S DECLARATION, LISTING PHONE MESSAGES**
9 **FROM WATTS GUERRA, DOES NOT INCLUDE A SOLICIATION OF VOTES**
10 **PRIOR TO MARCH 31, 2020**

11 In paragraph 5 of her declaration, POOL writes, "[a]ttached as Exhibit C is a true and correct
12 copy of the list of phone messages I received from Watts Guerra urging me to vote to approve the
13 Plan." WATTS GUERRA maintains the text of each message sent in this case, and affirms that no
14 phone message prior to March 31, 2020 urged POOL or any other client to vote to approve the Plan
15 prior to March 31, 2020 when the court-required materials including the Disclosure Statements
16 were transmitted to WATTS GUERRA's clients, including POOL. *See* Declaration of Mikal C.
17 Watts, ¶6, attached hereto as Exhibit 1. With respect to each of the Voicemails entitled "Lawsuit,"
18 referenced by POOL in Exhibit C, Mikal Watts personally left those for WATTS GUERRA's
19 clients including POOL as follows:
20

<u>Date</u>	<u>Length</u>	<u>Text of Voice Mail Left by WATTS GUERRA</u>
03/20	01:08	"Hi, this is Mikal Watts, your attorney representing you in the wildfire cases against PG&E. I'm calling to invite you to a live, telephonic community forum tomorrow morning at 11 AM. There will be no in-person meeting this weekend because of the coronavirus, so this will be your opportunity to ask questions and be updated on the current status of the case. At 11 AM tomorrow, you will receive a call from this number and automatically be joined into our discussion. This call is for current clients only. Paid for by Watts Guerra LLP 530-413-8151."
03/25	00:36	"Hi, this is Mikal Watts, one of your attorneys, with Joe Earley, representing you in the wildfire case against PG&E. I'm calling to

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

invite you to a second live telephone town hall community forum tomorrow afternoon at 4:40 PM. This will be your opportunity to ask questions and be updated on the current state of the case. At 4:40 pm tomorrow, you will receive a call from this number and automatically be joined into our live discussion. This call is for current clients only. Paid for by Watts Guerra LLP 530-413-8151."

03/26 00:33 "Hi, this is Mikal Watts, your attorney representing you in the wildfire cases against PG&E. I'm calling to invite you to a live telephonic town hall meeting to update you on your case. If you'd like to join, please visit pgelawsuit.com/update right now to listen in and have your questions answered. Paid for by Watts Guerra LLP 530-413-8151."

03/30 00:35 "Hi, this is Mikal Watts, your attorney representing you in the wildfire cases against PG&E. I'm calling to invite you to a live telephone community forum tomorrow evening at 5:20 PM. I'll update you on the status of your case, the upcoming vote, and I'll also be able to take your questions on this call. At 5:20 pm tomorrow you will receive a call from this number and automatically be joined into our live discussion. This call is for current clients only. Paid for by Watts Guerra LLP 530-413-8151."

03/31 00:42 "Hi, this is Mikal Watts, your attorney representing you in the wildfire cases against PG&E. After extensive negotiations, last night PG&E announced that their \$4 million fine that's owed to the district attorney in Butte County for the Camp Fire will not come from the Fire Victims Trust. That means it will not affect the amount available to you in the Trust. Later today, you'll receive a text and email information on how you can vote to accept this settlement. We'll also be calling you shortly after 5:20 this evening for a live telephone town hall. We urge you to vote to accept this settlement and we will continue to answer any questions you have. Paid for by Watts Guerra LLP 530-413-8151."

03/31 00:32 "Hi, this is Mikal Watts, your attorney representing you in the wildfire cases against PG&E. I'm calling to invite you to a live telephonic town hall meeting to update you on your case. If you'd like to join, please visit pgelawsuit.com/update right now to listen in and have your questions answered. Paid for by Watts Guerra LLP 530-413-8151."

04/01 00:30 "Hi, this is Mikal Watts, your attorney in the wildfire litigation against PG&E. Voting on PG&E's \$13.5 billion settlement has begun. You should've already received a text message with instructions on how to cast a ballot. We strongly urge all of our clients to vote to accept this settlement, but if you've not already

1 responded to each of the links we've texted you, please do so today.
2 Thank you. Paid for by Watts Guerra LLP 530-413-8151."

3 04/04 00:33 "Hi, this is Mikal Watts, your attorney representing you in the
4 wildfire cases against PG&E. I'm calling to invite you to a live
5 telephonic town hall meeting to update you on your case. If you'd
6 like to join, please visit pgelawsuit.com/update right now to listen in
and have your questions answered. Paid for by Watts Guerra LLP
530-413-8151."

7 See Declaration of Mikal C. Watts, ¶7, attached hereto as Exhibit 1. As to the call from Guy Watts
8 dated March 6, 2020, it did not involve a solicitation of POOL for her to vote in favor of the Plan.
9 Declaration of Guy L. Watts II, ¶3, attached hereto as Exhibit 3. Moreover, while a call from
10 "George" is referenced in Exhibit C to POOL's Declaration, Exhibit 2 to Doc. #7140, it is not a
11 call, nor a solicitation for votes, from WATTS GUERRA. See Declaration of Mikal C. Watts, ¶9,
12 attached hereto as Exhibit 1. The reference to a call from "George" on October 24, 2019 in Exhibit
13 C of Exhibit 2 to Doc. #7140 does not involve a solicitation for votes from WATTS GUERRA.
14 Indeed, at no time during WATTS GUERRA's involvement in this litigation against PG&E, from
15 October of 2017 to the present, has WATTS GUERRA employed an individual named "George."
16 See Declaration of Mikal C. Watts, ¶9, attached hereto as Exhibit 1.

17
18 F. **EXHIBIT "D" TO POOL'S DECLARATION, LISTING TEXT MESSAGES**
19 **FROM WATTS GUERRA, DOES NOT INCLUDE A SOLICIATION OF**
20 **VOTES PRIOR TO MARCH 31, 2020, WHEN THE COURT-ORDERED**
21 **MATERIALS, INCLUDING THE COURT-APPROVED DISCLOSURE**
22 **STATEMENT, WERE TRANSMITTED TO THE FIRE SURVIVORS**

23 In paragraph 5 of her declaration, POOL writes, "[a]ttached as Exhibit D are true and correct
24 copies of the text messages I received urging me to vote to approve the Plan." Instead, the texts
25 actually received demonstrate no solicitations until after the transmission of court-ordered
26 documents and the Disclosure Statement were received by WATTS GUERRA and disseminated to
27 its clients. To be clear, no lawyer associated with WATTS GUERRA – or employed by it, or
28 contractually associated with it in this litigation, has solicited votes via text until after the court-

1 ordered documents including the court-approved Disclosure Statements were transmitted to
2 WATTS GUERRA's clients on March 31, 2020. *See* Declaration of Mikal C. Watts, ¶10, attached
3 hereto as Exhibit 1.

4
5 **III. RESPONSE TO SUPPLEMENTAL DECLARATION OF JEREMIAH HALLISEY**

6 On May 11, 2020, at 9:06:09 p.m. on Monday evening, Jeremiah Hallisey filed his
7 Supplemental Declaration of Jeremiah Hallisey, Esq. in Support of Joinder of Certain Fire Victims
8 in William B. Abrams Motion to Designate Improperly Solicited Votes Pursuant to 11 U.S.C. §§
9 1125(B) and 1126(E) and Bankruptcy Rule 2019 (Doc. #7148), which attached as Exhibit A thereto
10 a PETITION TO GOVERNOR GAVIN NEWSOME from Victims of the 2017 and 2018 Northern
11 California Wildfires ("the Petition"). WATTS GUERRA responds thereto as follows:

12 *First*, 11 U.S.C. §1126 provides that "[a] class of interests has accepted a plan if such plan
13 has been accepted by holders of such interests, other than any entity designated under subsection
14 (e) of this section, that hold at least two-thirds in amount of the allowed interests of such class held
15 by holders of such interests, other than any entity designated under subsection (e) of this section,
16 that have accepted or rejected such plan." It does not state that if less than five percent of the
17 holders of such interests purport to sign an internet petition over six days, that permits them to
18 thereby disenfranchise the votes of those "that hold at least two-thirds in amount of the allowed
19 interests of such class held by holders of such interests." As such, why this petition is even relevant
20 to the relief sought herein is unknown.

21
22
23 *Second*, while Mr. Hallisey swears that his Petition is signed by "Victims of the 2017 and
24 2018 Northern California Wildfires," this statement is suspect at best as the Petition appears to have
25 been accessible for persons to sign – whether or not they filed Proof of Claim forms with Prime
26 Clerk. A cursory comparison in the early-morning hours of the date of this filing revealed hundreds
27
28

of names on the petition that do not show a corresponding Proof of Claim forms filed with Prime Clerk. Some obvious examples of this are as follows:

- (1) the presence on the Petition of Micaela Scarpulla (p. 118 of 163, row 3), the daughter of Mr. Hallisey's co-counsel, Francis Scarpulla, but not an individual who filed a Proof of Claim form with Prime Clerk;
- (2) despite the fact that no one named "Scarpulla" filed a Proof of Claim with Prime Clerk, the presence of three individuals with the last name "Scarpulla" on the Petition¹; and
- (3) the presence of other names that quite obviously are fictitious and not real people, and for which no Proof of Claim form has been filed with Prime Clerk:

Error 04 Fort Worth, US	2020-05-05	p. 025 of 163, row 09
Nugget 92 City, US	2020-05-05	p. 026 of 163, row 02
Mario jumpman Mario, Massachusetts, US	2020-05-05	p. 027 of 163, row 20
Follow me ! thkiddo_.kiara Brighton, US	2020-05-06	p. 048 of 163, row 12
Mexican Joe Wichita, US	2020-05-06	p. 065 of 163, row 19
Kookie Bt21 US	2020-05-07	p. 074 of 163, row 21
Wouldn't You Like To Know Westminster US	2020-05-07	p. 077 of 163, row 08
Octii's junk acc 4 school US	2020-05-07	p. 116 of 163, row 09
Poison Stars Summerville US	2020-05-08	p. 129 of 163, row 16
Aaaa eeee Hialeah, US	2020-05-08	p. 140 of 163, row 20
Wolf Cool US	2020-05-08	p. 141 of 163, row 17
Lego Speedwagon Murfreesboro, US	2020-05-09	p. 142 of 163, row 13
This shut dumb Petitions don't do shit Yeeter, US	2020-05-09	p. 144 of 163, row 01
Treeboon martin niggersville, US	2020-05-09	p. 145 of 163, row 08
who who Brooklyn, US	2020-05-09	p. 150 of 163, row 17
Sam the man Tulsa, US	2020-05-09	p. 150 of 163, row 21
Childish Gambino Charlotte, US	2020-05-10	p. 153 of 163, row 18
Jenna Oof Area 51, US	2020-05-10	p. 154 of 163, row 14
you're mom US	2020-05-10	p. 155 of 163, row 03
Big Boy Tommy Hicksville, US	2020-05-10	p. 154 of 163, row 12
Cold Judas Joe, US	2020-05-10	p. 154 of 163, row 19

¹ John Scarpulla San Francisco, CA 2020-05-07 p. 075 of 163, row 19
Micaela Scarpulla San Francisco, CA 2020-05-07 p. 118 of 163, row 03
Danielle Scarpulla San Francisco, Italy 2020-05-10 p. 155 of 163, row 09

Third, the Petition appears to have solicited participants on an internet page where individuals all over the world could click and sign, regardless of whether they were victims of the 2017 and 2018 Northern California Wildfires. While these wildfires caused persons to have to move, it is doubtful that true fire victims now reside in many of the following locations referenced in the Petition:

Paul Brown Malmesbury, England, UK	2020-05-05	p. 030 of 163, row 07
Virginia Udall Tai Tam, Hong Kong	2020-05-06	p. 053 of 163, row 11
ioannis bournakis Δάφνα, Greece	2020-05-06	p. 061 of 163, row 01
Samara Lucas Yonamine São Paulo, Brazil	2020-05-07	p. 073 of 163, row 11
sejeong Hwang 로스앤젤레스, US	2020-05-07	p. 080 of 163, row 20
Sylvie Lemaire Féternes, France	2020-05-07	p. 084 of 163, row 05
Mary Castelberg Athens, Greece	2020-05-07	p. 084 of 163, row 08
Mamadou Dia Bamako, Mali	2020-05-07	p. 085 of 163, row 02
Ian Philip Tucay GUIUAN, Philippines	2020-05-07	p. 085 of 163, row 05
Robert Borg Birkirkara, Malta	2020-05-07	p. 085 of 163, row 22
Mirjana Matyas Belgrade, Serbia	2020-05-07	p. 086 of 163, row 03
Androniki Hatjoullis Golders Green, UK	2020-05-07	p. 086 of 163, row 06
Aria Mehrparvar Iran	2020-05-07	p. 086 of 163, row 07
Eliza Pater Warsaw, Poland	2020-05-07	p. 086 of 163, row 08
Lyudmil Grigorov Конкорд, US	2020-05-07	p. 087 of 163, row 17
Eva Huda Toronto, Canada	2020-05-07	p. 088 of 163, row 18
Lino Apap Mosta, Malta	2020-05-07	p. 088 of 163, row 21
simon Agius Mosta, Malta	2020-05-07	p. 091 of 163, row 07
Αθανασιος Καραγκουννης Athens, Greece	2020-05-07	p. 091 of 163, row 11
Leonard Bezzina Swieqi, Malta	2020-05-07	p. 091 of 163, row 12
anna efremithi volos, Greece	2020-05-07	p. 093 of 163, row 07
edward dem San Gwann, Malta	2020-05-07	p. 108 of 163, row 03
Kiara Koutoulakis, Athens, Greece	2020-05-07	p. 112 of 163, row 06
Μαρία Παπαναστασίου Athens, Greece	2020-05-07	p. 112 of 163, row 08
John Anthony Accra, Ghana	2020-05-07	p. 112 of 163, row 13
arlette simon France	2020-05-07	p. 118 of 163, row 02
Aggelikh Tseggene Pátra, Greece	2020-05-07	p. 118 of 163, row 06
Patrick Jones Blasco Cebu City, Philippines	2020-05-08	p. 118 of 163, row 17
Keith Lenard Basuan		
Santa Rosa Laguna, Philippines	2020-05-08	p. 119 of 163, row 01
Pilar Conde Montevideo, Uruguay	2020-05-08	p. 122 of 163, row 04
Marianthi Karadima Athens, Greece	2020-05-08	p. 129 of 163, row 04
Luis Pimentel Mexico	2020-05-08	p. 129 of 163, row 07
Nicole Solis Manila, Philippines	2020-05-08	p. 129 of 163, row 18
Nalin Utreja Shimla, India	2020-05-08	p. 129 of 163, row 19
Minda Agno Cavite, Philippines	2020-05-08	p. 129 of 163, row 20
Bárbara Teixeira		
Charneca De Caparica, Portugal	2020-05-08	p. 132 of 163, row 11

1	Hope Peters Roermond, Netherlands	2020-05-08	p. 132 of 163, row 14
2	Chantal Peters Roermond, UK	2020-05-08	p. 132 of 163, row 15
3	Emman Domingo` Los Baños, Philippines	2020-05-08	p. 132 of 163, row 16
4	Anita Sephton Wigan, UK	2020-05-08	p. 132 of 163, row 17
5	Catherine Modeste London, UK	2020-05-08	p. 132 of 163, row 20
6	Θαλεια Ευτυχιδου Athens, Greece	2020-05-08	p. 132 of 163, row 21
7	Ana Vieyra Mexico	2020-05-08	p. 132 of 163, row 22
8	Martha Girma Mumbai, India	2020-05-08	p. 133 of 163, row 05
9	Jacques Brun Pointe-du-Chêne, Canada	2020-05-08	p. 134 of 163, row 05
10	Modou Lamin Jammeh Abuko, Gambia	2020-05-08	p. 134 of 163, row 07
11	Sainey Loum Banjul, Gambia	2020-05-08	p. 134 of 163, row 08
12	Piet Ellis Boksburg, South Africa	2020-05-08	p. 134 of 163, row 09
13	linc conard Uden, Netherlands	2020-05-08	p. 134 of 163, row 10
14	Nadine Pecorella Sliema, Malta	2020-05-08	p. 134 of 163, row 14
15	James Thompson Ottawa, Canada	2020-05-08	p. 134 of 163, row 17
16	YVONNE SHOEBRIDGE Lydd, UK	2020-05-08	p. 134 of 163, row 18
17	NAND KISHORE NEGI Shimla, India	2020-05-08	p. 134 of 163, row 21
18	Julie Wiebe Winnipeg, Canada	2020-05-08	p. 135 of 163, row 02
19	AMIT SHARMA India	2020-05-08	p. 135 of 163, row 03
20	Wilhelm Silfwerarm Banjul, Gambia	2020-05-08	p. 135 of 163, row 04
21	Mohammad Hosein Alaei Tehran, Iran	2020-05-08	p. 137 of 163, row 21
22	Irum Tariq Birmingham, UK	2020-05-08	p. 138 of 163, row 03
23	Georgia Allan Mytilene, Greece	2020-05-08	p. 138 of 163, row 07
24	IOULIA SKOUFIA Athens, Greece	2020-05-08	p. 138 of 163, row 16
25	cecilia azevedo sao paulo, Brazil	2020-05-08	p. 138 of 163, row 17
26	Amaya Noah Iola, Venezuela	2020-05-08	p. 138 of 163, row 19
27	Ikhlaas Mohammed Rotterdam, Netherlands	2020-05-08	p. 139 of 163, row 02
28	Dimitra Kazoglou Thessaloniki, Greece	2020-05-08	p. 139 of 163, row 11
29	Rosa Cabrerizo L'Hospitalet, Spain	2020-05-09	p. 143 of 163, row 05
30	John Paul Saliva Pasig City, Philippines	2020-05-09	p. 143 of 163, row 10
31	Victoria Chelliú Villa Alemana, Chile	2020-05-09	p. 143 of 163, row 11
32	Aswin Lakshman Palghat, India	2020-05-09	p. 144 of 163, row 11
33	Thalia Chatzilari Athens, Greece	2020-05-09	p. 144 of 163, row 17
34	Josell Cainoy Bacolod, Philippines	2020-05-09	p. 144 of 163, row 18
35	Varneet Singh Ludhiana, India	2020-05-09	p. 144 of 163, row 19
36	Mary-Ann van der Linden		
37	Nijmegen, Netherlands	2020-05-09	p. 145 of 163, row 04
38	Anjali Gulaniya Jaipur, India	2020-05-09	p. 145 of 163, row 06
39	Kanchan Rathore Jaipur, India	2020-05-09	p. 145 of 163, row 09
40	Andreas Mylopoulos Athens, Greece	2020-05-09	p. 145 of 163, row 22
41	Nátaly Lima Sao Paulo, Brazil	2020-05-09	p. 148 of 163, row 14
42	Paula McCarthy Liverpool, UK	2020-05-09	p. 148 of 163, row 17
43	Sasa Obradovic Sarajevo, Bosnia	2020-05-09	p. 149 of 163, row 01
44	Jomon John Thiruvananthapuram, India	2020-05-09	p. 149 of 163, row 22
45	Boris Lukeza Sarajevo, Bosnia	2020-05-09	p. 150 of 163, row 01
46	ILIAS KATSINARIS Patras, Greece	2020-05-09	p. 151 of 163, row 10
47	Mara Costa Portugal	2020-05-09	p. 151 of 163, row 11
48	M L Kalinovik, Bosnia	2020-05-09	p. 152 of 163, row 18

1	Valory Xiomara Jönköping, Sweden	2020-05-10	p. 153 of 163, row 10
2	dimple sirvi Coimbatore, India	2020-05-10	p. 154 of 163, row 08
3	Raymond Manalo Calamva, Philippines	2020-05-10	p. 154 of 163, row 11
4	Janos Bercades Cainta, Rizal, Philippines	2020-05-10	p. 154 of 163, row 15
5	Danielle Scarpulla San Francisco, Italy	2020-05-10	p. 155 of 163, row 09
6	Gaetano D'Angelo Birkirkara, Malta	2020-05-10	p. 155 of 163, row 10
7	Helen Kaleab Addis Ababa, Ethiopia	2020-05-10	p. 155 of 163, row 12
8	Simon McFarlane Pembroke, Malta	2020-05-10	p. 155 of 163, row 15
9	konstantinos panousos karlovassi		
10	samos, Greece	2020-05-10	p. 155 of 163, row 18
11	Fahime Ghazian Iran	2020-05-10	p. 155 of 163, row 19
12	Iokasti Siohou Athens, Greece	2020-05-10	p. 156 of 163, row 03
13	Vedant Gannarpwar Nagpur, India	2020-05-10	p. 156 of 163, row 04
14	Jean Chagnon Montréal, Germany	2020-05-10	p. 156 of 163, row 16
15	Albert Suda Lija, Malta	2020-05-10	p. 156 of 163, row 17
16	Priya Bagdas Chennai, India	2020-05-10	p. 157 of 163, row 11
17	MohammadAli Jamei Iran	2020-05-10	p. 158 of 163, row 02
18	Jelena Djokic Sarajevo, Bosnia	2020-05-10	p. 159 of 163, row 03
19	artemis sheydaee iran, US	2020-05-10	p. 159 of 163, row 10
20	Aleksandar Banović Trstenik, Serbia	2020-05-10	p. 159 of 163, row 15
21	Nerissa Iglopas Cebu City, Philippines	2020-05-11	p. 160 of 163, row 20
22	Flavia Viera La Paz, Bolivia	2020-05-11	p. 161 of 163, row 04
23	Cristina Gabrielli Canazei, Italy	2020-05-11	p. 161 of 163, row 19
24	Samim Kamyab Iran	2020-05-11	p. 161 of 163, row 07
25	Nastasja Babic Sarajevo, Bosnia	2020-05-11	p. 162 of 163, row 13
26	Abbie Stewart Woolwich, UK	2020-05-11	p. 162 of 163, row 16
27	Marina Milosevic Banja Luka, Bosnia	2020-05-11	p. 162 of 163, row 17
28	Dejan Toholj Sarajevo, Bosnia	2020-05-11	p. 162 of 163, row 18

Respectfully submitted,

Dated: May 12, 2020

WATTS GUERRA LLP

By: /s/ Mikal C. Watts
Mikal C. Watts

Attorney for Numerous Wild Fire Claimants